

**REMARKS**

Favorable reconsideration and allowance of the subject application are respectfully requested in view of the following remarks.

**Summary of the Office Action**

Claims 1-3, 6, 11-13 and 16 stand rejected under 35 U.S.C. §103(a) as being unpatentable over *Johnson et al.* (WO 99/05567) in view of *Usui et al.* (U.S. Patent No. 5,844,533).

Claims 4, 5, 14, 15 and 17-20 are objected to as being dependent upon a rejected base claim, but would be allowable if rewritten in independent form.

Claims 7-10 are allowed.

**Summary of the Response to the Office Action**

Applicant amends claims 1, 3-11 and 13-20 by this amendment. Claims 1-20 remain currently pending.

**The Disposition of the Claims**

Applicant appreciates the Examiner's allowance of claims 7-10 and the Examiner's indication that claims 4, 5, 14, 15 and 17-20 would allowable if rewritten in independent form as noted at paragraphs 3 and 4 of the Office Action.

In addition, claims 1-3, 6, 11-13 and 16 are also believed to be allowable for at least the following reasons.

**Claim Rejection Under 35 U.S.C. §103(a)**

Claims 1-3, 6, 11-13 and 16 stand rejected under 35 U.S.C. §103(a) as being unpatentable over *Johnson et al.* in view of *Usui et al.* To the extent that this rejection may be applied to the claims, as newly-amended, it is respectfully traversed for at least the following reasons.

Applicant respectfully submits that *Johnson et al.* and *Usui et al.*, whether taken separately or in combination, fail to teach or suggest every feature of claims 1-3, 6, 11-13 and 16, as newly-amended. For instance, Applicant respectfully submits that neither *Johnson et al.* nor *Usui et al.* teaches or suggests the claimed combination as set forth in independent claim 1, as newly-amended, including at least “setting first modulated data in advance in the liquid crystal display,” “calculating a difference between the first modulated data and input data,” and “modulating the input data by using the calculated difference to output second modulated data.”

In addition, Applicant respectfully submits that neither *Johnson et al.* nor *Usui et al.* teaches or suggests the claimed combination as set forth in independent claim 11, as newly-amended, including “a modulator modulating the input data by using subtracted data between first modulated data set in advance and the input data from the input line to output second modulated data.”

The Office Action appears to assert that the arrangement as shown in FIG. 7 of *Johnson et al.* corresponds to the method as set forth in independent claim 1 and the apparatus as set forth in independent claim 11, except that “Johnson does not disclose using a calculator to calculate a difference between the old data and the new data.” Paragraph 2, lines 9-10 of the Office Action. Thus, the Office Action further cites the comparator (322) of *Usui et al.* as allegedly remedying the deficiencies of *Johnson et al.* In particular, the Office Action asserts that “[i]t would have been obvious... to substitute Usui’s calculator circuit for Johnson’s LUT [(look-up table)] to determine the difference between the old data and the new data.” Paragraph 2, lines 15-16 of the Office Action.

However, even assuming that there exists motivation or suggestion in the prior art to substitute the look-up table (33) of *Johnson et al.* with the comparator (322) of *Usui et al.*,

*Johnson et al.* in view of *Usui et al.* still fail to teach or suggest “setting first modulated data in advance in the liquid crystal display,” “calculating a difference between the first modulated data and input data,” and “modulating the input data by using the calculated difference to output second modulated data,” as set forth in independent claim 1, or “a modulator modulating the input data by using subtracted data between first modulated data set in advance and the input data from the input line to output second modulated data,” as set forth in independent claim 11.

In contrast to Applicant’s claimed combinations as a whole, the “comparator 322 [of *Usui et al.* merely] subtracts image data in the previous frame... from the current image data.”

Column 17, lines 59-61 of *Usui et al.* No portion of *Johnson et al.*’s disclosure or *Usui et al.*’s disclosure discusses differences or subtracted data between first modulated data set in advance and input data to output second modulated data.

M.P.E.P. §2143.03 instructs that “[t]o establish *prima facie* obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. *In re Royka*, 490 F.2d 981, 180 USPQ 580 (CCPA 1974).” Since, in view of the above, *Johnson et al.* and *Usui et al.*, whether taken separately or in combination, fail to teach or suggest each and every element set forth in independent claims 1 and 11, as newly-amended, it is respectfully submitted that *Johnson et al.* in view of *Usui et al.* do not render claims 1 and 11 unpatentable. Further, since claims 2, 3, 6, 12, 13 and 16 depend from claims 1 and 11, it is respectfully submitted that *Johnson et al.* in view of *Usui et al.* also do not render claims 2, 3, 6, 12, 13 and 16 unpatentable. Accordingly, withdrawal of the rejection of claims 1-3, 6, 11-13 and 16 under 35 U.S.C. §103(a) is respectfully requested.

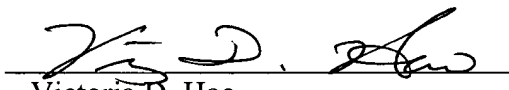
**Conclusion**

In view of the foregoing, withdrawal of the rejections and allowance of the pending claims are earnestly solicited. Should there remain any questions or comments regarding this response or the application in general, the Examiner is urged to contact the undersigned at the number listed below.

If there are any other fees due in connection with the filing of this response, please charge the fees to our Deposit Account No. 50-0310. If a fee is required for an extension of time under 37 C.F.R. § 1.136 not accounted for above, such extension is requested and the fee should also be charged to our Deposit Account.

Respectfully submitted,

**MORGAN, LEWIS & BOCKIUS LLP**

By:   
Victoria D. Hao  
Registration No. 47,630

Dated: February 17, 2004

**Customer No.: 009629**  
**MORGAN, LEWIS & BOCKIUS LLP**  
1111 Pennsylvania Avenue, N.W.  
Washington, D.C. 20004  
Telephone: 202.739.3000  
Facsimile: 202.739.3001